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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane, Room 138
Carson City, Nevada 89706

August 13, 2002

Mr. Dave McCarthy
Atlantic Richfield Company
307 E Park Ave.
Anaconda, Montana 59711

SUBJECT: Response to Atlantic Richfield Company written correspondence dated July 9, 2002 regarding the Draft Wabuska Drain Work Plan, dated April 30, 2002

Dear Mr. McCarthy:

The Nevada Division of Environmental Protection (NDEP) has received and evaluated your written correspondence dated July 9, 2002 regarding your initial response to regulatory comments pertaining to the Draft Wabuska Drain Work Plan, dated April 30, 2002. This office provides the following comments from NDEP, EPA, BLM, as agreed upon by other technical representatives of the Yerington Technical Work Group (YTWG), during the July 16, 2002 meeting.

As discussed during the July 16, 2002 meeting, the investigation of the Wabuska Drain will be conducted in a phased approach because the workplan will require significant revision and is not projected to be finalized until after the summer/fall sampling opportunity. The YTWG does not want to delay sampling surface sediments and any available flow past this summer/fall. Atlantic Richfield has agreed to sample at eight locations and to collect additional discrete samples at two of these locations to complete Phase I of the Wabuska Drain Workplan. At Atlantic Richfield's request, a small sub-group of the YTWG will aid in selecting sample locations on August 29, 2002.

The following guidance is again provided and is appropriate for all phases of sampling of the Wabuska Drain. Please use the following toxicity benchmarks to ensure that the detection limits for this Phase 1 sampling are adequate. For the drain and adjacent habitat, the three most likely receptors of concern are aquatic invertebrates, waterfowl which feed on these invertebrates, and wetland plants. We suggest the US EPA freshwater chronic ambient water quality criteria (available at http://oaspub.epa.gov/wqsdatabase/epa.rep_parameter) be used for comparison to the analytical data for water samples, and the most conservative freshwater sediment benchmarks in MacDonald et al. (2000) and the US DOE terrestrial plant toxicity benchmarks (available at <http://www.esd.ornl.gov/programs/ecorisk/reports.html>) be used for comparison to the sediment/soil data. We include wetland plants among the receptors of concern because the Wabuska Drain intersects and connects with a seasonal wetland (the Perazzo Slough) as it crosses the Yerington Paiute Indian Reservation.

Quality Assurance;

- 1) Method 6010B is now available on the EPA web site (search www.epa.gov for SW846, and scroll to the new method for metals in sediments).
- 2) The QAPP should denote that the trowel should be plastic and not metal; some aluminum trowels may be scraped by small rocks and add aluminum or other metals to the samples.
- 3) Metals do not have to be iced in the field. There is a possibility of the cold temperatures causing precipitation.

Accordingly, please provide a short technical memorandum to document the amended sampling plan. This must be submitted to NDEP for review and concurrence by the regulatory agencies and must be received not later than September 5, 2002. Phase I field work must be completed not later than October 1, 2002. Also, please provide the **Draft Final Wabuska Drain Work Plan, Yerington Mine Site** not later than October 21, 2002.

Should you have any questions or if I can be of any assistance, please do not hesitate to contact me at (775) 687-9376 or FAX (775) 687-6396. All future correspondence regarding this subject should be addressed to the undersigned.

Sincerely,



Arthur G. Gravenstein, P.E.
Staff Engineer
Remediation Branch
Bureau of Corrective Action

cc: Ms. Jennifer Carr, NDEP
 Mr. Doug Zimmerman, NDEP
 Mr. Brad Shipley, Project Manager, Bureau of Land Management, Carson City Field Office, 5665 Morgan Mill Road, Carson City, NV 89701
 Ms. Molly Mayo, Senior Mediator, Meridian Institute, P.O. Box 1829 Dillon, CO 80435
 Mr. Elwood Emm, Chairman, Yerington Paiute Tribe, 607 W. Bridge St., Yerington, NV 89447
 Mr. Robert Quintero, Chairman, Walker River Painter Tribe, P.O. Box 220, Schulz, NV 89427
 Mr. Tad Williams, Environmental Director, Walker River Painter Tribe, P.O. Box 220, Schulz, NV 89427
 Mr. Stanley Winemaker, U.S. Department of Interior, Fish and Wildlife Service, 1340 Financial Blvd, Suite 234, Reno, NV 89502-7147
 Mr. John Krause, Environmental Coordinator, Bureau of Indian Affairs, Phoenix Area Office, P.O. Box 10, Phoenix, AZ 85001
 Ms. Bonnie Arthur, Project Manager, U.S. Environmental Protection Agency, Region IX, 75 Hawthorne Street, San Francisco, CA 94105
 Ms. Phyllis Honeywell, Commissioner, Lyon County, 31 South Main Street, Yerington, NV 89447
 Mr. Steve Snyder, County Manager, Lyon County, 31 South Main Street, Yerington, NV 89447
 Mr. Dan Newell, Manager, City of Yerington, 102 South Main Street, Yerington, NV
 Mr. Bob McQueen, Habitat Bureau Chief, Nevada Division of Wildlife, 1100 Valley Road, Reno, NV 89520
 Ms. Libby Levy, 75 Hawthorne Street, San Francisco, CA 94105
 Mr. Ken Paulsen, Behre Dolbear & Company, Inc., PO Box 1930 Arvada CO 80001